

DONATO J. BATTISTA  
HUDSON COUNTY COUNSEL  
ADMINISTRATION BUILDING ANNEX  
567 PAVONIA AVENUE  
JERSEY CITY, NEW JERSEY 07306  
(201) 795-6250  
BY: DANIEL J. DESALVO (#010502006)  
DEPUTY COUNTY COUNSEL  
ATTORNEY FOR COUNTY OF HUDSON, E. JUNIOR MALDONADO, IN HIS  
OFFICIAL CAPACITY AS HUDSON COUNTY CLERK

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CHRISTINE CONFORTI, ARATI	:	UNITED STATES DISTRICT COURT
ARATI KREIBICH, MICO LUCIDE	:	DISTRICT OF NEW JERSEY
JOSEPH MARCHICA,	:	
KEVIN MCMILLAN, ZINOVIA	:	
SPEZAKIS, & NJ WORKING	:	
FAMILIES ALLIANCE,	:	
	:	
Plaintiffs,	:	CASE NO. 3:20-CV-08267-FLW-TJB
v.	:	
	:	
COUNTY OF HUDSON, E. JUNIOR	:	CROSS NOTICE OF MOTION
MALDONADO, in his official	:	TO DISMISS PURSUANT TO
Capacity as Hudson County	:	RULE 12(b) (6)
Clerk, et al	:	
Defendants.	:	

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TO: BRETT M. PUGACH  
BROMBERG LAW LLC  
43 WEST 43RD STREET  
SUITE 32  
New York, NY 10036-7424

1. **Moving Party:** Defendant, E. Junior Maldonado, in his official capacity.
2. **Return Date of Motion:** TO BE SET BY COURT
3. **Place:** Federal District Court Clerk  
District of New Jersey  
50 Walnut Street  
Newark N.J. 07101

4. **Purpose:** Order for Cross Motion to Dismiss.

5. **Supporting Documents:** The County relies upon the Certification of Daniel J. DeSalvo and supporting Brief filed with this motion.

6. **Oral Argument:** Movant waives oral argument and submits its motion on the papers

7. **Pretrial Order/Conference:** There does not exist a pretrial order or a pretrial conference.

I certify that copies of this Cross Notice of Motion to Dismiss together with supporting Certification(s), proposed form of Order and supporting Brief were electronically filed with the Federal Court Clerk.

Donato J. Battista  
Hudson County Counsel

  
s/Daniel J. DeSalvo  
Daniel J. DeSalvo  
Deputy County Counsel

Dated: March 25, 2021

DONATO J. BATTISTA  
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FAMILIES ALLIANCE,	:	
Plaintiffs,		CASE NO. 3:20-CV-08267-FLW-TJB
v.	:	
COUNTY OF HUDSON, E. JUNIOR	:	ORDER
MALDONADO, in his official	:	
Capacity as Hudson County	:	
Clerk, et al	:	
Defendants.	:	

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This matter having been brought before the Court by the Hudson County Counsel's Office, Daniel J. DeSalvo, Deputy County Counsel, appearing and the Court having considered the moving papers, and good cause having been shown;

**IT IS** on this              day of                          , 2021

**ORDERED**, that the motion of Defendants to Dismiss, be and the same is hereby granted; and it is further  
**ORDERED**, that the motion of the Defendants, County of Hudson, E. Junior Maldonado, in his official capacity as

Hudson County Clerk to Dismiss is hereby is granted; and it is further

**ORDERED**, that Plaintiff's complaint be and the same is hereby is dismissed with prejudice; and it is further

**ORDERED**, that service of this Order shall be effectuated upon all parties upon its upload to e-court filing and to the extent a party is not served electronically, a copy of the Order will be served within seven (7) days of the date of this Order.

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